

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

## UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia

Norfolk Division

FILED

SEP 26 2023

CLERK, U.S. DISTRICT COURT  
NORFOLK, VA

JANE DOE

Case No. 2:23cv470

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

NORFOLK STATE UNIVERSITY

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	JANE DOE
Street Address	120 KIDD BLVD
City and County	NORFOLK
State and Zip Code	23502
Telephone Number	757-339-3434
E-mail Address	

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

**Defendant No. 1**

Name	NORFOLK STATE UNIVERSITY
Job or Title <i>(if known)</i>	
Street Address	700 PARK AVE,
City and County	NORFOLK
State and Zip Code	VA 23502
Telephone Number	(757) 823-8396
E-mail Address <i>(if known)</i>	

**Defendant No. 2**

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

**Defendant No. 3**

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

**Defendant No. 4**

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

### A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

18 U.S.C 2421 MANN ACT  
18 U.S.C 2422 A) TRANSPORTATION FOR SEX  
18 U.S.C 2423 B) TRANSPORTATION OF MINORS  
20 U.S.C 1092) CLERY ACT

### B. If the Basis for Jurisdiction Is Diversity of Citizenship

#### 1. The Plaintiff(s)

##### a. If the plaintiff is an individual

The plaintiff, *(name)* \_\_\_\_\_, is a citizen of the  
State of *(name)* \_\_\_\_\_.

##### b. If the plaintiff is a corporation

The plaintiff, *(name)* \_\_\_\_\_, is incorporated  
under the laws of the State of *(name)* \_\_\_\_\_,  
and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

#### 2. The Defendant(s)

##### a. If the defendant is an individual

The defendant, *(name)* \_\_\_\_\_, is a citizen of  
the State of *(name)* \_\_\_\_\_. Or is a citizen of  
*(foreign nation)* \_\_\_\_\_.

## b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

## 3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:  
 \$75,000,000 FOR 10 YEAR DAMAGES OCCURED TO PLAINTIFF FROM SEXUAL ABUSE TO A MINOR CHILD BY NSU EMPLOYEE. WHERE MINOR WAS TAKEN TO NSU PLACE OF EMPLOYMENT FOR IMMORAL SEXUAL ACTS AND BECAUSE OF GROSS NEGLIGENCE IT OCCURED OVER SUCH A SPAN OF TIME THE UNIVERSITY WAS USED AS A BAWDY PLACE DURING THE YEARS THEY TOO VIOLATED THE FEDERAL CLERY ACT. Attached

## III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

see attached , thank you

## IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

see attached, thank you

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: \_\_\_\_\_

Signature of Plaintiff

Printed Name of Plaintiff

B. For Attorneys

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

UNITED STATES DISTRICT COURT : EASTERN DISTRICT OF VIRGINIA

JANE DOE

*Plaintiff,*

v.

Case No.:

NORFOLK STATE UNIVERSITY,

BOARD OF VISITORS OF NORFOLK STATE UNIVERSITY,

*Defendant.*

**PETITION FOR DECLARATORY JUDGMENT**

Jane Doe., Plaintiff, Asks this Honorable federal court to move an order concerning the propriety of anonymous participation in the highly sensitive proceeding of an underage minor. On June 11, 2022 John Doe sued Norfolk State University in this proper venue United States Eastern District Federal Court. Protected VSC 8.01-15.1. This Plaintiff, Jane Doe's name was protected in a week-long North Carolina State Superior hearing March of 2016. Jane Doe was used under anonymity laws in the existing precedent with this plaintiff vs. the NSU employee, Michael Williams. Michael Williams was convicted in The Department of Social Services in 2014 and again for the final time in 2016. The North Carolina Superior Court where Williams got sentenced 24 years to Central Prison NC for three counts of First Degree Sexual Exploitation of a minor, Jane Doe. The plaintiff, Jane Doe Pro Se, moves this Honorable Court for judgment to declare Defendant Norfolk State University("NSU") negligent and causing physical, mental, social, and emotional damages to the plaintiff. The plaintiff declares that Norfolk State University owes Doe compensation for damages and was negligent by their lack of policy and further oversight measures during an estimated 9-10 year period where, Michael Williams, an NSU faculty person, continually sexually trafficked Jane Doe across state lines from North

Carolina to Virginia for sexual immoral purposes against her will. Jane Doe was sexually molested as an underage minor while transported to and while on Norfolk State University Campus throughout Michael Williams employment. This a violation of the Mann Act, which In 1978, Congress updated the definition of "transportation" in the act, and added protection for minors of either sex or against commercial sexual exploitation.

The plaintiff wishes to protect a minor child's name as protected per VSC 8.01-15.1, where the incidents occurred when she was an underage minor. The Federal acts in question a part of the gross negligence at Norfolk State Universities are as follows, 18 USC 2421, MANN ACT, 18 USC 2422 TRANSPORTATION FOR SEX, 18 USC 2423 TRANSPORTATION OF MINORS FOR SEX. During the years of these occurrences, it too happens that Norfolk State violated the Clery Act and were condemned. The Head of the Engineering Information Technology, IT Department Michael Williams trafficked Doe across state lines over and over again as an underage minor making Norfolk State University a Bawdy place. The Head of the Engineering Information Technology Dept Michael L. Williams NSU faculty trafficked the underage minor to Norfolk State University against her will to commit immoral sexual acts to her at his place of employment. Norfolk State University must perform its duties, follow and maintain a safe campus for all, and do so under The Commonwealth of Virginia state law and the laws of The United States. All people's safety should be considered when looking at the campus security on campus especially in relation to the University Employees. Norfolk State's scope of concern with regards to NSU employees and bringing children to the workplace is very relevant. This raises even more of a need to enforce policy, and reduce the liabilities of NSU employees concerning underage minors while situated on such University campuses. The plaintiff, Jane Doe, asks the court to declare that Norfolk State University was negligent and lacked security



protocols during her minor years as an adolescent. NSU employee Michael Williams used leniency, position of power, time & also frequency, and access to the property to sexually abuse, torment and commit bawdy crimes against Jane Doe the underage minor committing illegal sexual activity against her will at the University. Jane Doe won and convicted Michael Williams in North Carolina Superior Court to 24 plus years ending his career at the University. If a security policy, defining rules, were in place to avoid such an environment, rules governing the faculty and staff would have protected her when on campus. However without further safety measures to maintain a safe environment for NSU employees, the plaintiff instead states the following:

**PARTIES**

1. Jane Doe, a Norfolk-born and current resident and citizen, is a survivor of Childhood Sexual Abuse & First Degree Exploitation which was proved in the District of Social Services court in 2014 D.S.S and The State of North Carolina Superior court in March of 2016. Doe Graduated from Old Dominion University in 2019 with her bachelor's degree.
2. Michael Williams worked for Norfolk State University. Williams was sentenced for Child Sexual Exploitation of a minor , Jane Doe of the First Degree. The immoral sexual acts by a guardian was proved with child pornography that was confiscated as Forensic evidence. Williams was convicted in D.S.S in 2014 and had a final conviction in 2016. His sentence was for 24 years in North Carolina where he was sentenced to Central Prison.
3. Dr. Javaune Adams Gaston President of Norfolk State University Dr. Adams-Gaston spent more than 25 years as a licensed psychologist in private



practice. Dr. Javaune Adams-Gaston is the seventh President of Norfolk State University. She began her tenure on June 24, 2019. As President, she is committed to ensuring that Norfolk State University fulfills its mission as an

4. Dr. Washington , former president of Engineering. Witnessed multiple durations where Doe was on campus with Williams while at work. .
5. “HBCU for the modern world, is a university grounded by its heritage, focused on the future, and deeply committed to student success.”
6. The Commonwealth’s Attorney General’s Office <https://www.oag.state.va.us> has initiated a 100% alliance against Human Trafficking in order to eradicate Human Trafficking in Virginia. & issues The HBCU funding.
7. Norfolk State University is the location where the sexual attacks happened, and recurring offenses happened by their employee which damaged the then minor plaintiff. Norfolk State University is where the guilty party was proven in court as of March 2016 Michael Williams held employment.
8. Prathap Basappa NSU employee testified in support of Michael Williams in the March 2016 court case where Michael Lee Williams was found guilty.
9. Cheryl Woolridge Former NSU employee witnessed Jane Doe’s frequent accompanying to Michael Williams and the amount of time Doe would be there for the years she was employed.
10. Dr. Kyo Song Head of Engineering Dept. at that time at Norfolk State University. Witness to the frequency of Jane Doe at campus.

**STATEMENT OF CLAIM**

1. Upon Graduating from Norfolk State University Michael Williams was hired to the University on or around 2002.
2. In or around 2004, Jane Doe was in the 3rd grade and forced and allowed to attend the First View Event and was illegally fondled by Mr. Williams at the University before the event by Michael Williams and during breaking from display setups in the office while the rest of the body of people were distracted at the First View event.
3. On or around 2006 at the engineering building where Human Resources was on the top floor, Michael Williams had an office in the back of a surplus classroom. Which meant it was full of equipment, furniture, and air conditioning amongst many other items and things being tossed out. Jane Doe was in what was called the back of the surplus classroom that hid the wood door in the back where the office hid with no windows in either office or surplus classroom. There was an office that was assigned to Mr. Williams where the fellatio, illegal touching of a minor, and constant harboring to invoke an attack against her during the duration of the entire work shift.
4. That dark office in the back of the surplus room is where she got attacked and told by Mr. Williams multiple times to not tell anyone because he said he could do what he wanted there. Williams forced himself on the 10 or 11 year old Doe. She was forced to remove her clothes so he could see her he wanted her to with the door closed at the Campus.
5. This happened multiple times in back of the surplus room office where she also was forced into penile vaginal penetration at age 13.

6. Jane Doe overheard fellow NSU employee Cheryl Woolridge complaining about how Michael Williams would never let Jane Doe have with her or leave the room with her on or about 2007-2008, go for walks or anywhere. She has since in discussion called this odd behavior looking back.
7. Cheryl Woolridge reports today in conversation the unbelievable frequency with which Williams would bring minor Jane Doe to the campus, is unfair.
8. Woolridge recalls that she had since discussed with Jane Doe about Lisa who was a student teacher who complained of it being unfair that she couldn't bring her son with her to the Campus whenever she wanted because the office would be full if they all brought in children to work as much as Williams. Williams brought Jane Doe into the campus over the summer, teacher work days, spring breaks, and frequently during his 10 hour plus shifts.
9. Jane Doe recalls being a child underneath the desk across the classroom and overhearing Lisa and Cheryl talking about how it wasn't fair that Michael Williams was able to bring her with him all day when he was at work and they couldn't bring all of their kids.
10. When being brought onto the University, security would acknowledge the underage minor at times, this brings the university acknowledgement through security at times if an NSU security was in the parking booth. These occurrences would then become long periods of up to 10 and 12 hours where in these hours illegal sexual activity harmed Jane Doe and the minor was forced and allowed to be at NSU against her will.

11. There were multiple occasions when president Washington of the Dept. would step in and notice Doe in the office, he was aware that by reason of questioning that his employee brought Doe to work with him, Washington asked was she going to be there for the entire work shift with him? Washington did fur an eyebrow in explaining that he was aware of Williams working a long shift at the University asking would Doe be there for the entire shift. Williams had already trained Doe to not act bothered for being there even though it was torture to her. Williams replied of her maturity and that she wouldn't bother anyone that she was so mature Williams would remark.
12. On or around 2006 Jane Doe remembers when her school was closed for a teacher work day leaving Michael Williams a vantage point to bring 10 year old Jane to work with him. Doe being so young was still afraid of elevators and the disappointing feeling of the false sense of security from the University Williams pants undone and hearing the belt come undone as he sat in the desk chair size green pants on the floor the NSU employee exposed his genitals below his desk to Jane Doe forced to use her hands and nails to fondle scratch Mr Williams genitalia at his desk in a classroom with no windows in the back of two surplus rooms door shut that early morning at Norfolk State University. She would be on the campus well past 7 p.m. that day.
13. The back surplus classrooms are assigned near Prathap Bassapah. ( Prathap would later serve Mr. Williams in support of him as a witness when Mr Williams was convicted with Exploitation of a minor 3 counts First Degree.
14. From North Carolina to Norfolk State Williams trafficked Doe against her will to perform fondling and forced exposure of genitalia. Williams would force her into

wearing clothing that would easily expose her but not get attention at The University.

While The University is paying him.

15. Jane was having a panic like state from being forced to be at NSU getting up at 5:30 a.m. The coffee pot Jane was being requested to rinse out got smashed in the sink from the stress that day of being in a state of panic.
16. Dr. Kyo Song was so familiar with the victim Jane Doe that he gave her a totem from his country and a Korean totem chain for her to keep he had come to know and was familiar with seeing Jane Doe on campus during Williams work shifts.
17. On or around 2007 These were the construction years at this time in the 6th grade worse because of the construction the office was scattered, and demolition there caused an incident for penetration against Jane Doe by the Norfolk State Employee that brought her across The NC/ VA State line and regularly into the University grounds to isolate her for an entire work day to await the opportunity to assault Jane Doe making inappropriate touches, isolation, and illegal sexual activity at Norfolk State University.
18. During these years of construction, in 2007 an incident where Jane Doe was forced against her will to go to the University she remembers the nonchalant response by NSU security when she tried to tell NSU security she wasn't his daughter and trying to get his attention at the entry of the sometimes manned security booth. Jane got punished by Williams for trying to bring attention to herself while on campus and commanded her to not ever speak up again and continued being punished that week.
19. In or around 2007 as Jane Doe recalls her 6th-grade year she was made to attend the First View Event which meant she would have to help talk to all the prospective

students that day for the day-long event and being in fear for when all the people left. That day, when she was forced to perform illegal immoral sexual acts fondling genitalia or be punished she felt this was problematic of a workplace to allow her to be there and the repetitive pattern of Michael Williams design bringing her an under age minor to place of employment for criminal activity brings up vicarious liability being an employee at NSU while committing criminal activity.

20. Williams used seditious means force Doe to use the NSU paperclips to harm herself in using the clips and paper clips to harm her breast, Williams would also make her use rubber bands off his desk to restrict blood flow to breast and using mutilation to harming her while on his hours on the campus working for Norfolk State University.
21. Williams forced the underage minor to take pictures on a cell phone in the bathroom and show him her minor nude photos from the bathroom while on the clock working for NSU.
22. Construction at the campus when Doe was in about the 7th grade, and they were undergoing transition of desks and constant moving of an office from a boxed off room at the back of two classrooms led to the isolation from lapsed time at the university. Prior to full transition of office spaces resulted in an occurrence of fellatio at the University. The minor Jane Doe was forced to commit fellatio to then NSU employed Michael L. Williams IT dept faculty dept,
23. Upon the new construction on or around 2009 st age 13 -14 Jane was abused by the NSU employee Williams isolating and assaulting the minor during the duration of time spent against her will at NSU. The intent of the high frequency accompaniment

- of Jane, orchestrates the opportunity to attack her in the dangerous environment like the clean room where lasers are.
24. Lack of employee policy guidelines to provide a structured environment led to the harboring of a minor and ongoing abuse occurring against Jane on the Norfolk State University campus, the property used as a bawdy place by the NSU employee.
25. On or around the year 2010 Jane Doe had a boyfriend in the 8th grade when she was about 14-15 years of age who also stayed at the University for an extended period where they were allowed to spend time together in a classroom. Michael L Williams the employee got upset for her behavior and Jane remembers punishment from Michael Williams for behavior the following week including a fellatio attack. Her boyfriend was so upset/ uncomfortable about being on campus for so long that he got his mom to come to pick him up leaving campus with his mom.
26. Throughout the years Michael Williams would intentionally be known at the University for being the first one to work and the last one to leave, creating a reputation and time frame which can incite the illegal sexual activity against the minor girl on the University campus over on or about the years of 2002 - 2012.
27. During the year 2011, Jane Doe was in 10th grade, while Williams showed off to his colleagues her pictures on Facebook about how mature she looked, embarrassing Doe by showing them pictures on his Blackberry. This technology was later a part of a major confiscation. Detectives in Currituck County 3/14/2016- 3/18/2016 used technology as forensic evidence against Williams with production and possession of child pornography, Jane Doe's images of which were viewed during employment and viewed under the desk of their campus.



28. The following are buildings or names of events which she was forced to attend by the Norfolk State employee Michael Williams allowed by the University. William P. Robinson St. Tech Center, worked long hours on purpose to wait while everyone left. Construction years building was being worked on.
29. Jane recalls during her 8th-grade year when Mr. Williams had reached the point of ejaculation from vaginal penetration to the minor while in a locked classroom, while at Norfolk University with Jane Doe that led to semen body fluid appearing on his pants when he found that he took the rest of the day off to go back to North Carolina where he lived to cover up and change out of pants.
30. Holidays university closings where he had access to the University and had a keyless fob to access 24/7 during campus openings and closings summers.
31. Technology on campus changed to 24-hour access with a fob that would automatically open the doors to the university.
32. One holiday break in 2011 that year Jane was brought to the campus overnight for the purpose Williams said to pick up study books. He was supposed to be furthering his education. However, minor girl Jane Doe was forced after dark that night with his 24/7 campus access to have illegal sex and vaginal penetration by an NSU employee, this night was for the sole purpose for illegal sexual activity. Breaching and breaking the law putting each and everyone around him in harm's way.
33. Jane often to this day tells herself the ongoing torment at the University wouldn't have happened if the University had regulated their faculty in regulating oversight of youth minors' access to the campus. She would not be kept against her will at NSU for these long durations of time, if the employee had been held liable or needed

special permission to accompany youth visitors , proper oversight would prevent such damages.

34. On March 6 2012 Jane Doe told a friend at her school in NC about the abuse that was happening to her all these years she was moved away from the NSU employee and she fled from his guardianship where the investigation began against him that would later convict Michael Williams.
35. 2014 Michael Williams was convicted of Child sexual abuse in the Department of Social Services in Currituck North Carolina.
36. The case was sent to the North Carolina Superior Courts in March of 2016 where Michael Williams was finally convicted to prison for 24 years for illegal sexual exploitation of a child. Possession and production of child Pornographic materials from all technology was seized during the Currituck county, North Carolina forensic investigation of Williams.
37. During the Trial of March 2016 Norfolk State active employee Prathap Bassapah attended court to serve his testimony in support of the proven guilty Michael L. Williams. In his testimony he mentions how much he knew both Jane Doe and Michael Williams and how often he had seen them together and very often as a witness in favor of Michael Williams in the trial thus furthering damages from the University capacity to have Dr. Bassapah was a witness for Williams in the trial.
38. Vicarious liability of Virginia requires that the employee of an establishment has vicarious liability upon the employee actively being employed as well as committing an offense while actively within the scope of their job.

39. The lack of devised protocols in place to provide standards regarding family and peers underage minors allowed on campus caused Doe damages. This policy with guidelines to prevent damages would have prevented the heinous acts committed on Norfolk State University by their employee on Campus to Jane Doe an under-age Caucasian minor.
40. "Due to property liability, employee productivity, and maintaining professional decorum, many companies clearly state that bringing your child to work is inappropriate and should be avoided, "says Erika Prafder of H Careers.com
41. 2018 Norfolk State gets exposed for their 2016 erroneously listed sexual assault reports as having 0 sexual assault incidences being scrutinized in the community as violating the Clery Act according to WAVY-TV 10.

### **Damages**

1. Long Term injury recovery - Jane Doe was born in Norfolk Virginia and has since prosecuted and convicted her abuser in a court of law and has not properly dealt with the horrid past and damages she's come away with but only wants to reclaim her outlook and more importantly the overall safety of the University and her home city.
2. The physiological damages from the sexual abuse happening on that campus have led to emotional stress.
3. Jane lives in fear, a state of loss, and is having to overcome her being a victim of harm that occurred at Norfolk State University, by the Norfolk State employee. Jane Doe, an advocate for Higher education, graduated from Old Dominion University.

4. Doe suffers from Post Traumatic Stress Disorder , insomnia and insurmountable grief and lifelong psychological trauma from the abuse that occurred at Norfolk State by the Norfolk State employee all those years. She has been unable to seek the proper psychological treatments to recover from abuse since then as an adult.
5. She was hospitalized at Sentara Leigh from trauma in 2017, the doctors said she had a stress breakdown from all the trauma, she unfortunately had no choice but to take over a week away from her studies from Old Dominion that Year.
6. Trauma is an ongoing recurrence, a part of P.T.S.D that will require overcoming the abuse that happened at that University. The Anxiety and worry of the times Jane Doe was abused by her guardian at Norfolk State University require healing. The ongoing and recurrent trauma is damage caused as a result of lack of oversight of Norfolk State University's employees and gross negligence.
7. Norfolk State University has a 0 tolerance policy for such illegal behavior. Their handbook and policy on record are as follows, Title IX at NSU James R Robinson "NSU fosters a safe learning and working environment that supports academic and professional growth of students, staff & faculty & does not tolerate sexual harassment, including violence in its community and is obligated to address incidents of which it has notice" Dr. Javaune Adams Gaston President.
8. Violations are of the following cases arising under the Mann Act; 18 U.S.C 2421, V.S.C 18.2-355 Taking detaining etc person for prostitution etc or consenting thereto; human trafficking section 3 & 4. which In 1978, Congress updated the definition of "transportation" in the act, and added protection for minors of either sex against commercial sexual exploitation in 1978, Congress updated the definition of

"transportation" in the act and added protection for minors of either sex against commercial sexual exploitation

9. Upon notice of the above-mentioned factual allegations and final addressing of incidents that occurred, Jane Doe calls for the following to be made whole from such damages of the nearly 9 - 10-year span of abuse. This is the notice to such president, Dr. Javaune Adams Gaston President which requires an obligation to address incidents of which are listed in this claim and said factual allegations.
10. Vicarious liability of Virginia requires that the employee of an establishment has vicarious liability upon the employee actively being employed as well as committing an offense while actively within the scope of their job.

#### **PRAYER FOR RELIEF**

The plaintiff respectfully requests that this court:

1. Declare Norfolk State University as Negligent in their design of policies, issuance of campus safety, and employees' visitor oversight from security. According to The American Association of University Professors article titled, What Do We Know about Campus Policies on Children in the Workplace? An under-examined aspect of "family-friendly" policies. "Most Universities identify the purpose and scope of the policy and define terms such as *child*, *caregiver*, and *high-risk area*. The policies outline the contexts and times in which employees can bring their children to campus. Some are very specific, such as the following example: "Children of employees are allowed in the workplace for brief visits, generally no longer than two (2) hours." Others say that employees may bring children to the workplace "only occasionally with supervisor's

approval.” And still others forbid it, either strictly (“University employees are prohibited from bringing children on campus during work hours”)

2. It is my understanding that the University publicly announced this week they were issuing new policy surrounding campus safety. Along with the settlement for damages Doe orders new policy be enforced for their employees. Such policy to encompass protections to the University environment at Norfolk State University. Doe commits to amicably work with them to design such a policy to further protect them from being used for sex trafficking as Jane Doe was Sexually trafficked to Norfolk State University by Norfolk State employee near or around a 10 year span of time.
3. Professors, faculty, maintenance personnel, security, and administrative staff are all employees of the university. As such, the institution has a duty of care to create a safe work environment and protect these persons situated on campus for any reason from workplace violence. Exposure to liabilities becomes much greater to all students, faculty and staff in negligence while serial predation of a minor occurs by a faculty member on campus.
4. WASHINGTON, June 26 (Reuters) - The U.S. Supreme Court on Monday rejected Ohio State University's bid to dismiss lawsuits brought by alleged sexual abuse victims of a now-deceased doctor who was employed by the school's athletic department and medical staff for nearly two decades.
5. Ensure Norfolk State University requires policies in place preventing employees' youth and any minors from unreasonable and extraneous time on campus, that results in durations of time which would disrupt the working environment and lead to further liabilities like sexual immoral use. Update Code of Ethics, which was breached by NSU

employee Williams during the time he was committing illegal immoral sexual acts against a minor where he should not be using funds, equipment, property, systems, information, time, or effort in one's position for personal gain which Williams violated.

6. Commend the valor in raising the issue and cause for reform in the workplace with due diligence for the greater good of the community and the State University in the Commonwealth of Virginia. Grant Doe an honorary Phd in Clinical Psychology for her profound amicable contributions to society and standard of professionalism and consciousness to improve measures of security of all youth minors with any association to the Campus.
7. The plaintiff asks to be granted the following amount for legal, medical costs, fees & damages from past, current, and future damages stated as the following Doe asks to resolve this sensitive matter. Including damage amounts for immense emotional, physiological & social damages of seventy-five million dollars for the past, and future medical costs, lifelong damages, and fiscal losses today due to such psychological trauma that occurred to underage minor Jane Doe over the near around 9-10 year span of time where sexual abuse happened at 700 Park Ave, Norfolk, VA 23504 on Norfolk State University campus by the criminally convicted Michael Williams a Norfolk State employee during his employment.



I, [REDACTED] am

Filing in this Honorable court 9/26/2023

[REDACTED]